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October 11, 2012

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St. S.W.
Washington, D.C. 20554

Re: Permitted Oral *Ex Parte* Presentation
ET Docket Nos. 10-236 and 06-155
IB Docket No. 05-20
WT Docket No. 07-293

Dear Ms. Dortch:

On October 9, 2012, representatives of The Boeing Company ("Boeing") met with Commissioner Jessica Rosenworcel and her senior legal advisor, David Goldman. Attending the meeting on behalf of Boeing were Theodore Austell, III, Vice President of Government Operations, Executive/Legislative and Regulatory Affairs; Audrey L. Allison, Director, Frequency Management Services; Frank C. Weaver, Director, Telecommunications Policy; and the undersigned. The attached talking points were distributed during the meeting.

Although the meeting was primarily introductory in nature, the parties addressed briefly the above-referenced proceedings. With respect to the experimental licensing proceeding, the Boeing representatives advocated the revision of the Commission's experimental licensing rules and procedures to make it easier for companies engaged in research and development to undertake experimental wireless operations. In particular, Boeing discouraged the imposition of burdensome coordination and consent requirements on experimental authorizations that do not pose an appreciable risk of causing harmful interference to other licensees.

The Boeing representatives also discussed the need for the Commission to complete expeditiously its long pending proceeding on the adoption of formal rules for the Aeronautical Mobile-Satellite Service ("AMSS") in the 14.0-14.5 GHz band. Boeing explained that AMSS (or earth stations aboard aircraft ("ESAA")), should properly be designated as a primary application of the Fixed Satellite Service, just as the Commission did in recent years for Earth Stations Onboard Vessels and for Vehicle Mounted Earth Stations.

37 Offices in 18 Countries

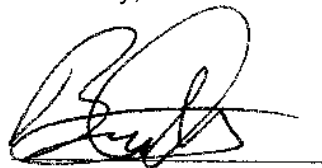
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The Boeing representatives were also asked about the compromise that was developed by AT&T and Sirius XM for the operation of Wireless Communications Service ("WCS") networks in the spectrum immediately adjacent to the Aeronautical Mobile Telemetry ("AMT") allocation that is used by Boeing and other aircraft manufacturers for critical flight test operations. Boeing indicated that it has no objection to the compromise contingent on AT&T's agreement that it supports rules requiring the coordination of both base and fixed stations operating in the upper portion of the WCS spectrum with AMT receivers in a manner consistent with ITU Recommendation M. 1459. Further, when operating in an LTE configuration, the upper portion of the WCS band will be used solely for downlink transmissions and not uplink transmissions from mobile or portable units. It is the understanding of Boeing that, working with the Aerospace and Flight Test Radio Coordinating Council ("AFTRCC"), AT&T has agreed to these requirements.

Thank you for your attention to this matter. Please contact the undersigned if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce A. Olcott", written over a horizontal line.

Bruce A. Olcott
Counsel to The Boeing Company

cc: J. Rosenworcel
D. Goldman